

**United States Bankruptcy Court
Middle District of Tennessee**

In re DEBBIE ANN ROBINSON

Case No. 3:14-bk-05275

Chapter 13

ssn: xxx-xx-2484

Debtor(s)

Judge Mashburn

**RESPONSE TO MOTION TO DISMISS FOR CAUSE, FOR FAILURE
OF THE DEBTORS TO COMPLY WITH A COURT ORDER**

Comes now the debtor, DEBBIE ANN ROBINSON, by and through counsel of record, CHERIE W. MEECE in response to the Trustee's Motion to Dismiss for Failure of the Debtor to Fund Plan and submits the following:

Debtor acknowledge they have not remitted payment since December 2015. In December 2015 debtor paid a lump sum payment of \$8,383.82 which she mistakenly believed would pay the plan in full. The funds were obtained from retirement monies Ms. Robinson received upon loosing her job. She has since obtained employment at the rate of approximately \$9.00 per hour with no anticipated overtime.

Debtor would submit that she has paid the amount of funds guaranteed pursuant to the plan confirmed on 9/12/2014 and in fact has as of July 2016 paid \$4,390.05 over and beyond what would currently be due pursuant to the plan. Debtor anticipates attorney filing a motion to amended the commitment term of her bankruptcy in order to allow her to obtain a discharge or in the alternative amend the current payment amount.

WHEREFORE PREMISES CONSIDERED, Debtor prays that the Trustee's Motion be denied and for any other and all relief deemed appropriate by this honorable court.

/s/Cherie W. Meece
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served by email by Electronic Case Noticing to Henry E. Hildebrand, III, Chapter 13 Trustee, and the U.S. Trustee on this the 7th day of July, 2016.

/s/Cherie W. Meece
CHERIE W. MEECE, BPR #018129